

Kevin C. Barrett, State Bar No. 8959
Barrett & Matura, P.C.
7575 Vegas Drive, Suite 150c
Las Vegas, Nevada 89128
Telephone: (702) 833-1033
Facsimile: (602) 792-5710
kbarrett@barrettmatura.com
Attorneys for Defendant
NGM Insurance Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GALLAGHER-KAISER CORPORATION, a
Michigan corporation,

Plaintiff,

vs.

LIBERTY DUCT, LLC, a Nevada limited
liability company; BIO SHIELD TECH, LLC,
a foreign limited liability company;
HARTFORD CASUALTY INSURANCE
COMPANY, an Indiana insurance corporation;
NGM INSURANCE COMPANY, a Florida
corporation; and DOES 1-10 Insurance
Company(ies), inclusive,

Defendants.

Case No. 2:14-cv-00869-GMN-DJA

**STIPULATION AND REQUEST
FOR ORDER EXTENDING
BRIEFING SCHEDULE FOR
DEFENDANT NGM INSURANCE
COMPANY'S MOTION TO
DISMISS FOURTH AMENDED
COMPLAINT**

(Second Request)

Defendant NGM Insurance Company ("NGM"), by and through its attorneys of
record, and Plaintiff Gallagher-Kaiser Corporation ("GKC"), by and through its attorneys
of record, hereby stipulate and agree as follows:

WHEREAS, NGM filed its Motion to Dismiss Fourth Amended Complaint on
January 17, 2024 ("Motion");

WHEREAS, GKC filed its Response to NGM's Motion on February 21, 2024;

1 **WHEREAS**, the original deadline for NGM to file its Reply to GKC's Response
2 ("Reply") is February 28, 2024, which was extended by stipulation [Doc. 196] to March 13,
3 2024;

4 **WHEREAS**, due to various scheduling and personal reasons, NGM requested and
5 received from GKC's counsel an additional one week to file its Reply to the Response;

6 **THEREFORE**, the parties agree and stipulate that NGM shall have up to and
7 including March 20, 2024, to file its Reply in support of its Motion.

8
9 Dated on March 11, 2024.

10
11 PEEL BRIMLEY, LLP

BARRETT & MATURA, P.C.

12 By: /s/ Cary B. Domina
13 Steven D. Meacham
14 Cary B. Domina
15 3333 East Serene Avenue, Suite 200
16 Henderson, Nevada 89074
17 Attorneys for Plaintiff

By: /s/ Kevin C. Barrett
Kevin C. Barrett
7575 Vegas Drive, Suite 150c
Las Vegas, Nevada 89128
Attorneys for Defendant NGM
Insurance Company

18 **IT IS SO ORDERED.**

19
20 
21 _____
22 U.S. District Court Judge
23
24
25
26
27
28